

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION

MONICA DANIEL HUTCHISON,

Plaintiff,

v.

TEXAS COUNTY, MISSOURI,
MICHAEL R. ANDERSON,
TEXAS COUNTY PROSECUTING
ATTORNEY, and
MICHAEL R. ANDERSON, individually,

Defendants.

Case No.: 09-3018-CV-S-RED

**DEFENDANT ANDERSON'S MOTION FOR LEAVE TO FILE SUGGESTIONS
IN EXCESS OF THOSE ALLOWED UNDER LOCAL RULE**

COMES NOW Defendant Michael R. Anderson, by and through counsel, and requests the Court to grant him leave to file Suggestions in Support of his Summary Judgment Motion which will exceed the 15-page maximum amount set forth in Local Rule 7.1. In support of its motion, Defendant Anderson states as follows:

1. Plaintiff has filed a Second Amended Complaint alleging nine separate causes of action. Although three of the causes of action have been dismissed, the factual allegations contained in those three causes have been incorporated into later counts. In fact, Count IX incorporates many or all of the previous eight counts.

2. In order to fully address each of the remaining claims pending, Defendant Anderson requests leave to file Suggestions in Support of his Motion for Summary Judgment in Excess of the 15-page maximum as set forth in Rule 7.1.

3. Due to the variety of the claims made against Defendant Anderson, including a mixture of federal and state law claims, as well as the lengthy time period from which the Plaintiff's claims arise, more than 15 pages will be required to completely address Defendant Anderson's reasons for summary judgment.

WHEREFORE, Defendant Anderson respectfully requests that the Court grant him leave to file Suggestion in Support of his Motion for Summary Judgment with a length in excess of 15 pages, and for such further relief as the Court deems just under the circumstances.

**TAYLOR, STAFFORD, CLITHERO,
FITZGERALD & HARRIS, LLP**

By /s/Warren E. Harris
Warren E. Harris
Missouri Bar No. 40372
wharris@taylorstafford.com
3315 E. Ridgeview, Suite 1000
Springfield, MO 65804
Tel: 417-887-2020
Fax: 417-887-8431
**COUNSEL FOR DEFENDANT
ANDERSON**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 13th day of August 2010 the foregoing *Defendant Anderson's Motion for Leave to File Suggestions in Excess of Those Allowed Under Local Rule* was electronically filed with the Clerk of the Court using the CM/ECF system which sent notification of such filing to counsel for Plaintiff, David L. Steelman and Corey L. Franklin.

/s/ Warren E. Harris
Warren E. Harris